

the construction of one main building to serve the majority of patient needs in a secure, controlled environment, but would perpetuate the existing inefficient housing of patients scattered onsite and closer to residential neighborhoods. It would also result in fewer living options for seniors than the Project, thereby impacting the financial feasibility of the site as a whole. Perhaps most importantly, it would significantly impact the aesthetics and historic character of the existing site and would not improve the sustainability of the onsite urban forest. (EIR, pp. 5-12 to 13.) For these reasons, this alternative is rejected.

**c. Alternative 2: Building Mitigation Alternative**

This alternative was developed to mitigate the loss of the historic structures that contribute to the National Register-eligible historic district on the site. Instead of demolishing the barn (Building 27)<sup>5</sup>, the men's dormitory (Building 25), Las Palmas (Building 15), and the Lodge (Building 16), this alternative proposed to retain some of these structures in their current location and relocate other structures elsewhere within the site in such a manner as to retain their historic significance. This alternative would reduce the number of trees removed by 22, 4 of which are protected under the Tree Protection Ordinance, but would still require removal of 228 trees. All other components of this alternative would be the same as the Project. (EIR, pp. 5-13 to 14.)

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<sup>5</sup> In response to comments on cultural resources, the EIR includes a study of the relocation of the Barn. (See Appendix G, see also p. 7-4.) The cost of such a relocation and adaptive reuse is approximately 23% to 32% more expensive than construction of a similar new structure.

Compared to the Project, this alternative would retain the key buildings that make up the National Register-eligible historic district and would reduce impacts to cultural resources to less than that of the Project. (Id. at pp. 5-16 to 17.) While the number of trees proposed for removal is reduced under this alternative, the impact is still the same as the Project. (Id. at p. 5-16.) The impacts to all other resource areas are substantially similar to the Project. (Id. at pp. 5-14 to 18.) However, unlike the Project, this alternative would create a significant and unavoidable aesthetic impact because the height of the independent living facility (Building 34) and assisted living facility (Building 32) would be increased to accommodate the reduced development footprint. (Id. at pp. 5-14.)

The City Council finds that this alternative does not meet all of the Project objectives. It does not improve the spatial relationship of the buildings, and instead results in a significant and unavoidable impact on views from San Gabriel Boulevard. It is also less compatible with the surrounding neighborhoods than the Project, and also would not maintain the internal character of the site as well as the Project. Finally, it results in the functionally less desirable need to combine assisted and independent living residents in a single structure, and puts these users closer to the behavioral health care portions of the site in direct contradiction to the goal of separating these two complimentary but different site functions. (Id. at p. 5-19.) For these reasons, this alternative is rejected.

CEQA Guidelines Section 15126.6(c) requires identification of the environmentally superior alternative, and if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. The No Project Alternative is **not** the environmentally superior alternative in this case. (EIR, p. 5-22.) Among the other alternatives, the Building Mitigation Alternative would be the environmentally superior alternative because it avoids a significant impact to historic resources. (Ibid.) However, the Building Mitigation Alternative creates a new aesthetic impact and would not meet all of the Project objectives, as discussed above.

**d. Alternative 3: Tree Mitigation Alternative**

The Tree Mitigation Alternative was developed to reduce impacts on trees. By rearranging the proposed new building on the site, this alternative would reduce the number of trees to be removed by 53, 11 of which qualify as protected. The footprint of the independent living facility (Building 34), the assisted living facility (Building 32), and the adolescent psychiatry unit (Building 33) were modified, but would still require the removal of approximately 197 trees. This alternative also retains two historic structures that were proposed to be demolished under the Project: Las Palmas (Building 15) and the Lodge (Building 16). (EIR, pp. 5-19 and 20.)

Thus, this alternative would result in a reduced impact to biological resources, although implementation of mitigation measures would still be required. (EIR, p. 5-22.) This alternative would also result in reduced impacts related to cultural resources,

although the impact would remain significant and unavoidable because the Barn (Building 25), which is a critical component of the historic district, would still be removed. (Id. at pp. 5-22 and 23.) Unlike the Project, this alternative would create a significant visual impact because the height of the independent living facility (Building 35) and assisted living facility (Building 32) would be increased to accommodate the reduced development footprint in order to minimize impacts to trees. (Id. at p. 5-20.) All other resource area impacts are substantially the same as the Project. (Id. at pp. 5-20 to 24.)

The City Council finds that this Project does not attain all of the Project objectives. Although this alternative would retain as many specimen trees as possible, it would not retain the aesthetic character of the existing campus. The increased building heights needed to minimize impacts to trees would cause these new structures to be out of place with the existing development. Further, the trees that would be retained under this alternative does not necessarily consist of the best specimens trees that can be retained and could compromise an opportunity to provide a healthy urban forest upon completion of the Project. This alternative would also compromise the function of the site since it would not allow the same buffer between the behavior health care uses and the independent and assisting living units. (EIR, pp. 5-24 to 25.) For these reasons, this alternative is rejected.

## **VI. RESOLUTION REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES**

State CEQA Guidelines Section 15126.2(c) requires an EIR to discuss the significant irreversible environmental changes which would be caused by the proposed project. An impact would occur under this category if, for example: (1) the Project involved a large commitment of nonrenewable resources; (2) the primary and secondary impacts of the Project would generally commit future generations to similar uses; (3) the Project involves uses in which irreversible damage could result from any potential environmental incidents associated with the Project; and (4) the proposed consumption of resources are not justified (for example, results in wasteful use of resources).

Construction of the Project would result in a commitment of limited, slowly renewable, and nonrenewable resources. Such resources would include certain types of lumber and other forest products; metals such as steel, copper, and lead; aggregate materials used in concrete and asphalt (e.g., stone, gravel, and sand); and other construction materials such as plastic. In addition, fossil fuels used in construction vehicles would also be consumed during construction of the Project. Operation of the Project would involve the continued consumption of limited, nonrenewable, and slowly renewable resources similar to other urban developments. These resources would include natural gas and electricity, petroleum-based fuels, fossil fuels, and water. Energy resources would be used for heating and cooling of buildings, transporting people and goods to and from the site, heating and refrigeration for food storage and

preparation, heating and cooling of water, and lighting. The additional vehicle trips associated with the Project would increase regional air pollutant emissions, which would incrementally contribute to the degradation of air quality. Under Title 24, Part 6 of the California Code of Regulation, conservation practices limiting the amount of energy consumed by the Project is required during operation. In addition, LEED standards would be incorporated into the Project that would reduce greenhouse gas emissions while also reducing energy and water usage through building efficiency measures. Despite conservation practices and guidelines in energy conservation, commitment to the use of the nonrenewable resources would be long-term. (EIR, pp. 4-12 to 13.)

## **VII. RESOLUTION REGARDING GROWTH-INDUCING IMPACTS**

State CEQA Guidelines Section 15126.2(d) requires an EIR to discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth inducement, however, is not considered necessarily detrimental, beneficial, or significant to the environment.

The Project would induce growth by providing approximately 160 new senior living units. In addition, the expanded psychiatric care, residential treatment and chemical dependency programs, and increased number of assisted living beds would create job growth. However, the overall increase is consistent with existing City and regional policies regarding population and businesses. The amount of residential and nonresidential development is within the development parameters established by the

City's 2004 General Plan, and the Project does not include the extension of roads or infrastructure. (EIR, p. 4-13.)

#### **VIII. RESOLUTION ADOPTING A MITIGATION MONITORING PLAN**

Pursuant to Public Resources Code Section 21081.6, the City Council hereby adopts the Mitigation Monitoring and Reporting Plan attached to this Resolution as Exhibit A, and incorporated herein.

#### **IX. RESOLUTION REGARDING CUSTODIAN OF RECORDS**

The documents and materials that constitute the record of proceedings on which these findings have been based are located at the City of Pasadena, City's Planning and Development Department at 175 North Garfield Avenue, Pasadena, California 91101.

**X. RESOLUTION REGARDING NOTICE OF DETERMINATION**

Staff is directed to file a Notice of Determination with the Clerk of the County of Los Angeles within five working days of final Project approval.

Adopted by the City Council for the City of Pasadena on the \_\_\_\_\_ day of \_\_\_\_\_, 2009 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

\_\_\_\_\_  
MARK JOMSKY, CMC, City Clerk

APPROVED AS TO FORM:

  
\_\_\_\_\_  
Theresa E. Fuentes  
Assistant City Attorney



**EXHIBIT A**

**LAS ENCINAS MITIGATION MONITORING AND REPORTING PROGRAM**

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance	
			Implementation Phase	Monitoring Phase	Initial	Date
<b>AIR QUALITY</b>						
Impact AIR-1	<b>AIR-A</b> During construction, the construction contractor shall only use paint that contains no more than 0.22 pounds/gallon (100 grams/liter) of volatile organic compounds.	City of Pasadena Planning Division review of plans. Applicant's mitigation monitoring supervisor to verify in the field.	Review plan specifications prior to issuance of building permits for Phases 2 (Bldgs. 32, 34, 39) and Phase 5 (Bldg 35).	Field verification during construction. Verification to be demonstrated in monthly mitigation monitoring report submitted to the City's Mitigation Monitoring Coordinator.		
<b>BIOLOGICAL RESOURCES</b>						
Impact BIO-1	<b>BIO-A</b> Should tree or other vegetation clearance and/or construction work need to occur during the breeding season for migratory non-game native bird species (generally March 1-September	City of Pasadena Planning Division to review report prepared by applicant's qualified biologist with experience	Prior to vegetation clearance and/or prior to issuance of building and grading permits related to all phases of construction.	Beginning 30 days prior to vegetation clearance and/or prior to issuance of building permits, on a		

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
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	<p>1, as early as February 1 and as late as September 15 for raptors), weekly bird surveys shall be performed to detect any protected native birds in the trees to be removed and other suitable nesting habitat within 300 feet of the construction work area (500 feet for raptors). The surveys shall be conducted 30 days prior to the disturbance of suitable nesting habitat by a qualified biologist with experience in conducting nesting bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work. If a protected native bird is found, the construction contractor shall delay all clearance/construction disturbance activities in suitable nesting habitat or within 300 feet of nesting</p>	<p>in conducting nesting surveys Project applicant's construction manager during construction shall instruct construction personnel on sensitivity of the area.</p>		<p>weekly basis, with the last survey no more than 3 days prior to initiation of clearance.</p>			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
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	<p>habitat (within 500 feet for raptor nesting habitat) until August 31 or continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) shall be postponed until the nest is vacated, juveniles have fledged, and when there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest shall be established in the field by a qualified biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed on the sensitivity of the area. The results of this measure shall be recorded to document compliance with applicable state and federal laws pertaining to the protection of native birds.</p>						

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
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Impact BIO-5	<b>BIO-B</b> During construction, no grading, trenching, material storage, or equipment parking shall be permitted within the tree protection zone. Tree protection zones shall be fenced using a 6-foot tall chain link fence. On each fenced tree protection zone a sign shall be hung noting which trees are located within the area. The Arborist of Record shall be responsible for establishing the tree protection zones. Construction fencing shall be installed prior to demolition activities around the trees to be preserved.	Implementation and monitoring by certified arborist retained by project applicant Applicant's mitigation monitoring supervisor shall monitor tree protection zones and install fencing per tree protection plan. Onsite inspection by City of Pasadena Code Compliance Division to verify installation of fencing prior to approval of demolition permit.	Fencing to be installed prior to demolition permit issuance.	Verification during construction. Continual compliance to be demonstrated in monthly mitigation monitoring report submitted to the City's Mitigation Monitoring Coordinator.			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
Impact BIO-5	<b>BIO-C</b> During construction, the Arborist of Record shall conduct regular meetings with the construction contractor to assure compliance with Tree Protection Specifications. The Tree Protection Specifications shall be developed by the Arborist of Record and shall include a schedule of different tree protection and maintenance activities, such as mulch application, supplemental watering, and root protection to be employed and maintained throughout the duration of construction. The Tree Protection Specifications shall be approved by the City prior to the receipt of a tree removal permit.	Implementation by certified arborist retained by Project Applicant.  City of Pasadena Planning Division to ensure compliance through monthly mitigation monitoring reports.	The tree protection plan shall be submitted to the Planning Division with the related plan check submittals for each phase of development. The applicant shall show compliance with the measures in the tree protection plan prior to issuance of grading permits, demolition permits and building permits within or directly adjacent to tree protection zones.	Verification during construction.  Continual compliance to be demonstrated in monthly mitigation monitoring report submitted to the City's Mitigation Monitoring Coordinator.			
<b>CULTURAL RESOURCES</b>							
Impact CUL-1	<b>CUL-A</b> The applicant shall prepare and submit to the California Office of Historic Preservation a nomination application for listing the Las Encinas Sanitarium/Hospital in	City of Pasadena Design and Historic Preservation Section to monitor	Within two years of approval of the 2007 Master Development Plan.	City of Pasadena Design and Historic Preservation Section			

Impact	Mitigation Measure	Responsible Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
	the National Register of Historic Places. Preparation and submittal shall be completed prior to issuance of building permits for phase one or within two years of approval of the 2007 Master Development Plan, whichever comes first.	compliance. Applicant to submit nomination application.					
Impact CUL -1	<b>CUL-B</b> The applicant shall complete black-and-white archival-level photo-documentation of all buildings constructed between 1910 and 1929 (Buildings 21, 21A, 26, 28, 24A, 24B, 24C, and 24D) defined as non-contributors and proposed for demolition. The photo-documentation shall be completed prior to issuance of demolition permits for the project. Photo-documentation shall be submitted to the City of Pasadena Design and Historic Preservation Section and the Pasadena Public Library.	Third-party architectural/historic preservation expert retained by project applicant for photo documentation. City of Pasadena Design and Historic Preservation Section to ensure submittal prior to issuance of permits.	Prior to issuance of any demolition permits of or directly adjacent to the buildings noted in CUL-B	City of Pasadena Design and Historic Preservation Section			

Impact	Mitigation Measure	Responsible Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
Impact CUL -1	<p><b>CUL-C</b> The windmill water tank house located at 310 S. San Gabriel Boulevard shall be preserved either in its current location, or moved to another location on the project site or moved to a location off of the project site. If it is moved off site, the applicant shall submit HABS photographic documentation of the structure prior to moving the structure. HABS documentation shall be submitted to the City of Pasadena Design and Historic Preservation Section and the Pasadena Public Library. Rehabilitation shall comply with the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.</p>	<p>City of Pasadena Design and Historic Preservation Section will ensure compliance.</p> <p>Third-party architectural/historic preservation expert retained by project applicant for photo documentation.</p>	<p>The proposed location shall be shown on design review submittals for phase three (buildings 36) and all subsequent building plans. HABS documentation shall be submitted prior to permits being issued for moving the structure. The rehabilitation's compliance with Secretary of Interior's standards shall be reviewed prior to plan check submittal and in compliance with City Municipal Codes.</p>	<p>Final plans and specifications.</p>			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance	
			Implementation Phase	Monitoring Phase	Initial	Date
Impact CUL -1	<b>CUL-D</b> Rehabilitation, additions and new construction pursuant to the Las Encinas Hospital 2007 Master Development Plan that is located in the National Register-eligible Las Encinas Sanitarium historic district shall comply with the Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings. Prior to the issuance of a demolition permit, the applicant shall hire a qualified historic preservation consultant or restoration architect to ensure compliance with the Secretary of the Interior's Standards.	City of Pasadena Design and Historic Preservation Section to determine compliance Third-party architectural/historic preservation expert retained by project applicant to ensure compliance with Secretary of Interior standards.	Prior to issuance of building and grading permits plans shall be reviewed by City of Pasadena Planning Division for compliance with this mitigation measure.	Final Plans and Specifications		
Impact CUL -1	<b>CUL-E</b> The applicant shall submit a landmark designation application for the oak tree and the water tank house located at 310 South San Gabriel (Building 13A) reasonably concurrent with the Design Commission submittal	City of Pasadena Design and Historic Preservation Section.	Reasonably concurrent with the Design Commission submittal for Phase 1 or within 2 years of the adoption of the 2007 Master Development Plan,	Final Plans and Specifications		



Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance			
			Implementation Phase	Monitoring Phase	Initial	Date	Remark	
	for Phase 1 or within 2 years of the adoption of the 2007 Master Development Plan, whichever comes first.		whichever comes first.					
Impact CUL -2	<b>CUL-F</b> A Research Design and Data Recovery Plan for Areas 1, 2 and 6 shall be prepared by a Registered Professional Archaeologist and approved by the Planner Manager (or designee) prior to the issuance of a demolition permit. The Research Design and Data Recovery Plan shall include 2 parts: a testing program and a data recovery program. The testing program shall be directed at determining the spatial distribution of historical resources to identify the extent of anticipated project-related impacts. The results of the testing program shall be documented in a technical report. If the testing program indicates the proposed project would not impact historical	Planner Manager or designee shall approve the plan. Qualified Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61) shall prepare the plan and report.	Prior to the issuance of a demolition or grading permit within Areas 1, 2, and 6.	Final Plans and Specifications				

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
	<p>resources, the data recovery program is not required.</p> <p>If the testing program indicates historical resources would be impacted by the proposed project, the technical report documenting the results shall be accompanied by a letter addressed to the City of Pasadena, indicating whether the Plan adequately addresses the resource-types encountered during the testing program. If resource-types not addressed in the Plan were encountered during testing, the Plan shall be revised accordingly prior to the commencement of the data recovery program. The data recovery program shall be aimed at the recovery of scientifically consequential information contained in the historical resources. The results of the data recovery program shall be documented</p>						

Impact	Mitigation Measure	Responsible Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance	
			Implementation Phase	Monitoring Phase	Initial	Date
Impact CUL -2	<p>in an Archaeological Data Recovery Report. The preparation of the Plan and the testing and data recovery programs shall be carried out by a qualified Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61) with experience pertaining to the history and prehistory of the Los Angeles area.</p> <p><b>CUL-G</b> All ground-disturbing activities associated with the proposed project (aside from any areas cleared by the Principal Archaeologist as a result of the testing and data recovery) shall be monitored by a qualified archaeological monitor. Prior to the issuance of a demolition permit, an Archaeological Monitoring and Discovery Plan shall be prepared outlining archaeological monitoring</p>	<p>Qualified archaeological monitor supervised by a Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61).</p>	<p>Plan shall be prepared prior to issuance of a demolition permit or grading permit within areas 1, 2, and 6.</p>	<p>Monitoring during demolition of buildings and structures, grading, trenching, utilities relocations and installations, the construction of fencing, and tree removal and plantings within</p>		

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
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	<p>procedures and appropriate treatment of discoveries, should any be made. Archaeological monitors shall be under the direct supervision of a Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61). Ground-disturbing activities to be monitored include, but are not limited to, the demolition of buildings and structures, grading, trenching, utilities relocations and installations, the construction of fencing, and tree removal and plantings.</p>			areas 1, 2, and 6.			
Impact CUL -2	<p><b>CUL-H</b> Unique archaeological materials (as that term is defined in CEQA, Public Resources Code Section 21083.2(g)) recovered during the investigation and archaeological monitoring shall be curated for posterity and access by future</p>	<p>Qualified archaeological monitor supervised by a Principal Investigator or Project Manager certified by the Register of</p>	<p>If objects are found during the testing and data recovery phase, a curation agreement shall be executed prior to a demolition permit.</p>	<p>During the recovery phase and all construction activity.</p>			

Impact	Mitigation Measure	Responsible Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
	researchers at an accredited curational facility. A curation agreement shall be executed prior to the issuance of a demolition permit.	Professional Archaeologists (qualifications derived from 36 CFR Part 61).					
<b>NOISE</b>							
Impact NOISE -1	<b>NOISE-A</b> Prior to the start of construction of the adolescent psychiatry facility (Building 33), the applicant shall vacate Building 3 (Las Flores). If use of Building 3 is deemed necessary to the functioning of the hospital, the applicant shall seek approval of an alternative means of mitigating construction noise levels. An alternative mitigation measure must be reviewed and approved by the Planning Division.	City of Pasadena Planning Division	Prior to the issuance of a building permit for building 33	Construction			
Impact NOISE -1	<b>NOISE-B</b> Prior to the start of construction of the psychiatric hospital (Building 35), the construction contractor shall install a temporary eight-foot wood wall	Implementation by City of Pasadena Planning Division. Continual	Prior to the issuance of a building permit for building 35	Continual compliance to be demonstrated in monthly mitigation monitoring report			

Impact	Mitigation Measure	Responsible Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
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	along the perimeter of the construction site where a direct ground level line of sight exists between the construction area and the sensitive receptors located in the adolescent psychiatry facility (Building 33).	existence confirmed by applicant's construction manager.		submitted to the City's Mitigation Monitoring Coordinator.			
Impact NOISE -1	<b>NOISE-C</b> During construction, the construction contractor shall equip all mobile construction equipment with properly operating mufflers or other noise reduction devices.	Applicant's construction manager	Construction	Continual compliance to be demonstrated in monthly mitigation monitoring report submitted to the City's Mitigation Monitoring Coordinator.			
Impact NOISE -1	<b>NOISE-D</b> During construction, the contractor shall schedule activities to avoid operating several pieces of equipment simultaneously, which causes high noise levels.	Applicant's construction manager	Construction	Continual compliance to be demonstrated in monthly mitigation monitoring report submitted to the City's Mitigation Monitoring Coordinator.			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
Impact NOISE -1	<b>NOISE-E</b> Prior to the start of construction, the construction contractor shall notify residences immediately adjacent to the project site (e.g., via flyers). The notices shall include a telephone number to the Pasadena Health Department for referral to determine if a violation of the City's Noise Ordinance is occurring.	Applicant's construction manager	Pre-Construction	Construction			
<b>PUBLIC SERVICES AND UTILITIES</b>							
Impact PS-3	<b>PS-A</b> Water usage of buildings to be retained shall be reduced by 20 percent. In order to demonstrate this reduction, the applicant shall use Worksheet WS-1 and WS-2, in Chapter 11 of the California Green Building Code entitled "Baseline Water Use" and "20% Reduction Water Use Calculation Table." Plumbing permits required in order to complete this reduction for the Oaks (Buildings 9 and 10) shall be	City of Pasadena Planning Division	Plans and submittals verifying compliance shall be submitted prior to finalizing permits for Buildings 36 and Building 1	Plumbing permits required in order to complete this reduction shall be finalized before permits for Buildings 36 and Building 1 are finalized.			

Impact	Mitigation Measure	Responsible Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
	finalized prior to a certificate of occupancy being released on Buildings 36. Plumbing permits required in order to complete this reduction for all other buildings (such as Buildings 1, 8, 19, 6 and 37) shall be finalized prior to permits being finalized for the proposed rehabilitation of Building 1 (Phase 5).						
Impact PS-3	<p><b>PS-B</b> The applicant shall submit a detailed landscape plan that proposes the planting of "California Friendly" plants and the use of high efficiency irrigation technology. Landscape and irrigation plans shall be submitted for review with each phase of the proposed project and shall be reviewed by the Design Commission in combination with building plans. Areas of the acute psychiatric hospital (Building 35) that are not tied into the phasing plan (such as the areas to the north and</p>	City of Pasadena Design and Historic Preservation Section.	Landscape and irrigation plans shall be submitted for review with each phase of the proposed project and shall be reviewed by the Design Commission in combination with building plans. Compliance shall be determined prior to certificate of occupancy.	Compliance with final landscape plan shall be determined by City of Pasadena Planning Division, prior to Certificate of Occupancy.			



Impact	Mitigation Measure	Responsible Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance			
			Implementation Phase	Monitoring Phase	Initial	Date	Remark	
	<p>south of Building 1) shall be completed with the improvements in Phase 3. The project's landscape architect shall work with a historical consultant to develop a sensitively designed landscape plan for the historically eligible landscape features.</p>							
<b>TRANSPORTATION AND TRAFFIC</b>								
Impact TRAN S-1	<p><b>TRANS-A</b> Prior to the issuance of a building permit, the applicant shall be required to comply with the provisions of the City of Pasadena Transportation Demand Management Ordinance. The Transportation Demand Management Ordinance requires developers of non-residential projects to submit and implement a Transportation Demand Program. This plan is used to implement measures that would reduce the number of vehicular trips by persons</p>	City of Pasadena Transportation Department	Prior to the issuance of a building permit for phase 1.	Final Plans and Specifications				

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
	traveling to the site by offering specific facilities, services, and actions designed to increase the use of alternative transportation modes (e.g., walking, bicycling, transit, etc.) and ridesharing.						

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